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December 20, 2022

VIA CM/ECF

Honorable John Michael Vazquez, U.S.D.J.
United States District Court for the District of New Jersey
50 Walnut Street
Newark, New Jersey 07101

**Re: Astralabs, Inc. v. Friedland,
Civ. No. 22-6507(JMV)**

Dear Judge Vazquez:

We represent Plaintiff, Astralabs, Inc. Kindly accept this informal letter brief in opposition to Plaintiff's motion for an extension of time to respond to Plaintiff's Verified Complaint.

As Your Honor is aware, and as Defendant acknowledges, this matter has been active since November 7, 2022 when the Verified Complaint was filed. Plaintiff sought a temporary restraining order to address Defendant's breach of contract, tortious interference and misappropriation of trade secrets.

Because of the filed motion for a temporary restraining order, the undersigned arranged for immediate service upon Defendant of the Verified Complaint and motion papers even before the summons was issued by the Clerk. *See* Certification of Counsel [D.E. 6-1] ¶¶ 2-4, Ex. A. As soon as the summons was issued, full service, which included a second copy of the Verified Complaint and the summons, was made via email per Defendant's instructions. The process server once again sought to personally serve Defendant with a complete service package that included the summons. *See id.* ¶¶ 5-7. Defendant was unable to be served despite several attempts at service and offers to coordinate timing of service. Service that included the summons was finally achieved on November 30, 2022.

Plaintiff submits that any extension of time, beyond the two-week Clerk's extension available under L. Civ. R. 6.1(b), is unnecessary and unwarranted. During the call with the Court on November 17, 2022, Defendant advised that he was seeking counsel. At this point, more than a month after that initial call, Defendant represents that apparently, he has still not engaged counsel.

Defendant has had a copy of the Verified Complaint since November 8, 2022. A response deadline of December 21st was more than reasonable. Given the urgency of the pleadings, and the expiration of the Temporary Restraining Order on December 15, 2022, it is imperative that this matter move forward to a Rule 16 conference and formal discovery, which require that an Answer be filed.

Honorable John Michael Vazquez, U.S.D.J.

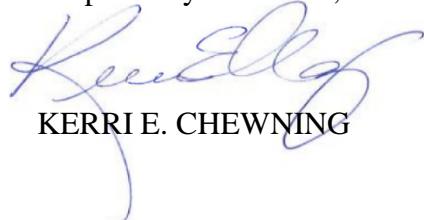
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For these reasons, Astralabs respectfully requests that the Court deny Defendant's request for any extension that would go beyond the Clerk's extension of two weeks, which would set Defendant's responsive pleading to be due on January 4, 2022.

We thank the Court for its attention to this matter.

Respectfully submitted,



KERRI E. CHEWNING

cc: Micah Friedland (via electronic and U.S. mail)
John R. Nelson, Esquire
Andrew J. Alvarado, Esquire

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